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ADMITTED: NEW YORK, EIGHTH CIRCUIT
SECOND CIRCUIT, ALGERIAN BAR
US COURT ON INTERNATIONAL TRADE

April 24, 2017

VIA ECF

The Honorable Sarah Netburn
United States Magistrate Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: In re Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

We represent Defendant the World Assembly of Muslim Youth (WAMY) in the above captioned matter. We write in relation to correspondence filed by counsel for the Kingdom of Saudi Arabia on April 7, 2017, [Docket # 3506], as relates to James Kriendler's interview with *Politico* magazine entitled "One Man's Quest to Prove Saudi Arabia Bankrolled 9/11". A copy of which is attached herein as Exhibit 1. In such interview Mr. Kreindler deliberately disclosed to the media the contents of at least one document produced by WAMY (document produced as bates number WAMY SA3821-3822) that was marked as confidential. WAMY respectfully requests a hearing seeking sanctions against Mr. Kreindler, including monetary damages, for his clear and blatant violation of the protective Order of the Honorable Richard Conway Casey of October 3, 2006 [Docket No. 345], *In re Terrorist Attacks on Sept. 11, 2001*, 454 F. Supp. 2d 220 (S.D.N.Y. 2006).

Page eight of this article references alleged information "Kreindler's team" garnered from WAMY's document production. The article mentions the "hundreds of thousands of pages of documents" from WAMY and goes on to disclose some of the contents of one document in particular, a communication from the Saudi Embassy in Washington, D.C. The document at issue (WAMY SA3821-3822) is specifically marked as "CONFIDENTIAL."

The October 3, 2006 Order clearly limits the disclosure of any document marked "CONFIDENTIAL" to limited categories of persons. See Order at p. 11, §H. The Order provides:

A Receiving Party may use Protected Material that is disclosed or produced by another Party or by a non-party in connection with this case only for prosecuting, defending, or attempting to settle this litigation. Such Protected Material may be disclosed only to the categories or persons and under the conditions described in this Order. *Id.* at §H.1.

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Members of the media are not within any category of persons authorized to receive confidential materials. *Id* at §H.3. Any violation of the Order is punishable by money damages. *Id* at §M. 1. This conduct by Mr. Kreindler also strongly supports the Kingdom of Saudi Arabia's request for strict enforcement of Judge Casey's May 25, 2004, Gag Order.

Mr. Kreindler has engaged in a quest to seek fame at the expense of the Defendants' right to confidentiality in this lawsuit. Mr. Kreindler's public disclosure of a CONFIDENTIAL WAMY document is in violation of the October 3, 2006 Order. As provided for in the Order, WAMY moves for money damages against Mr. Kreindler as punishment. Given the blatant and egregious nature of the violation, and to ensure that there are no future violations, a substantial monetary punishment is appropriate.

Sincerely,

/s/ Omar Mohammedi

Omar Mohammedi, Esq.

/s/ Fredrick Goetz

Frederick Goetz, Esq.

cc: Chambers of the Honorable George B. Daniels (via facsimile)
All MDL Counsel of Record (via ECF)

Enclosure